

MICHAEL C. ORMSBY
United States Attorney
Eastern District of Washington
Earl A. Hicks
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

DEC 20 2016

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

2:16-CR-207-RMP

INDICTMENT

UNITED STATES OF AMERICA,
Plaintiff,

vs.

TERRY RUSSELL HUNT,
MARY ALICE HUNT,
RUSSELL MELVIN HUNT, and
DEREK JON HUNT,
Defendants.

Vio: 18 U.S.C. §§ 371,
922(a)(1)(A), 923(a)
Conspiracy to Deal
Firearms Without a
Firearms License
(Count 1)

Vio: 18 U.S.C. §§ 922(a)(1)(A),
923(a), 924(a)(1)(D)
Dealing in Firearms Without a
License
(Count 2)

Vio: 18 U.S.C. §§ 922(a)(6), 924(a)(2)
False Statement in the
Purchase of a Firearm
(Counts: 3-16)

18 U.S.C. § 924(d)(1) and
28 U.S.C. § 2461(c)
Forfeiture Allegations

The Grand Jury charges that:

COUNT 1

Beginning on an exact date unknown but by on or about June 12, 2011, and
continuing through on or about December 2, 2015, in the Eastern District of Washington

INDICTMENT - 1

Pm/chicks/huntl/indictment/HuntIndictment.docx

1 and elsewhere, to include the Western District of Washington and the District of Nevada,
2 Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN
3 HUNT, and DEREK JON HUNT, did knowingly and intentionally combine, conspire,
4 confederate and agree with each other and with other persons, both known and unknown,
5 to commit the following offense against the United States, namely to engage in the
6 business of dealing in firearms without a federal firearms license, in violation of 18
7 U.S.C. §§ 922(a)(1)(A), 923(a), and one or more of the Defendants committed an overt
8 act to effect the object of the conspiracy, including but not exclusively, the sale of
9 firearms alleged in Paragraphs A through F of this Count, all said sales occurring
10 between on or about June 12, 2011, and on or about December 2, 2015, which are hereby
11 incorporated by reference:

- 12 A. Sale of Smith and Wesson, Model Bodyguard, .380 Caliber Pistol, bearing
13 serial number EBR8323, purchased by MARY HUNT, and later sold on or
14 about August 17, 2012;
- 15 B. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number
16 AAWT524, purchased by TERRY HUNT and later sold on or about
17 November 14, 2014;
- 18 C. Sale of Smith and Wesson, Model M&P, 9mm Caliber Pistol, bearing serial
19 number HVS5690, purchased by TERRY HUNT and later sold on or about
20 August 14, 2015;
- 21 D. Sale of Glock, Model 42, .380 Caliber Pistol, bearing serial number
22 ABEZ086, purchased by TERRY HUNT and later sold on or about August
23 14, 2015;
- 24 E. Sale of Smith and Wesson, Model Bodyguard, .38 Caliber Revolver, bearing
25 serial number CXZ3044, purchased by TERRY HUNT and later sold on or
26 about August 14, 2015;

- 1 F. Sale of Taurus, Model "The Judge," 45/410 Caliber Revolver, bearing serial
2 number BS632662, purchased by DEREK HUNT and later sold on or about
3 August 14, 2015.

4 In addition to the overt acts alleged in A through F above, at least one or more of
5 the following overt acts were committed in the course of and in furtherance of the
6 conspiracy.

- 7 G. On November 1, 2012, Daniel Thomas Hammock illegally purchased four
8 (4) firearms at the Cascade Arms Co. located in Olympia, WA, within the
9 Western District of Washington, for Terry Russell Hunt who told Hammock
10 that he was going to sell the firearms at the Reno Gun Show. This took place
11 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he
12 could not sell firearms at the Reno Gun Show without first obtaining a
13 Federal Firearm License.

- 14 H. On March 25, 2013, Daniel Thomas Hammock illegally purchased four (4)
15 firearms at the Cascade Arms Co. located in Olympia, WA, within the
16 Western District of Washington for Terry Russell Hunt who told Hammock
17 that he was going to sell the firearms at the Reno Gun Show. This took place
18 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he
19 could not sell firearms at the Reno Gun Show without first obtaining a
20 Federal Firearm License.

- 21 I. On August 9, 2013, Daniel Thomas Hammock illegally purchased four (4)
22 firearms at the Cascade Arms Co. located in Olympia, WA, within the
23 Western District of Washington for Terry Russell Hunt who told Hammock
24 that he was going to sell the firearms at the Reno Gun Show. This took place
25 after Terry Russell Hunt was advised by ATF on April 18, 2012, that he
26 could not sell firearms at the Reno Gun Show without first obtaining a
27 Federal Firearm License.
28

1 J. On the dates listed below one or more of the Defendants traveled to the
2 Reno Gun Show, located in Reno Nevada. within the District of Nevada, for
3 the purpose of selling firearms, which the Defendants had purchased in the
4 Eastern and Western Districts of Washington. Each date constitutes a
5 separate overt act in the furtherance of the Conspiracy charged in this count
6 of this Indictment.

- 7 i. August 17-19, 2012
- 8 ii. November 16-18, 2012
- 9 iii. April 11-14, 2013
- 10 iv. August 15-18, 2013
- 11 v. November 22-24, 2013
- 12 vi. April 18-20, 2014
- 13 vii. August 15-18, 2014
- 14 viii. November 14-16, 2014
- 15 ix. March 27-29, 2015
- 16 x. August 14-16, 2015

17 K. The allegations alleged in Counts 3 through 16 of this Indictment are each
18 separately alleged as a separate overt act taking place during and in
19 furtherance of the conspiracy alleged in this Count of this Indictment.

20 All in violation of 18 U.S.C. § 371.

21 COUNT 2

22 Beginning on an exact date unknown but by on or about June 12, 2011, and
23 continuing through on or about December 2, 2015, in the Eastern District of Washington
24 and elsewhere, to include the Western District of Washington and the District of Nevada,
25 the defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN
26 HUNT, and DEREK JON HUNT not being licensed dealers of firearms within the
27 meaning of Chapter 44, Title 18, United States Code, did wilfully engage in the business
28

1 of dealing in firearms, in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), 924(a)(1)(D)
2 and 18 U.S.C. § 2.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT 3

On or about November 13, 2012, in the Eastern District of Washington, the Defendant, DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 26, 9mm pistol, bearing serial number TVL444, and a Kimber 45 caliber pistol, bearing serial number KU198569, from H.O.T.S., Inc.; Hooked on Toys, 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to G.R., which statement was intended and likely to deceive G.R., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 4

On or about April 26, 2013, in the Eastern District of Washington, the Defendant, DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 23 Gen 4, .40 caliber pistol, bearing serial number UKR 175, and a Sig-Sauer Mosquito .22LR caliber pistol, bearing serial number F183033, from Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to K.B. which statement was intended and likely to deceive K.B., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 5

On or about July 31, 2015, in the Eastern District of Washington, the Defendant, DEREK JON HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 30, .45 caliber pistol, bearing serial number EZC105US, and a Taurus Model M4510, THE JUDGE .45/410 caliber revolver, bearing serial number BSE632662, and a Smith and Wesson Model SW9VE, 9mm pistol, bearing serial number RAY1900, and a Smith and Wesson Model 617-6 .22LR caliber revolver, bearing serial number CYH3048, and a Springfield Model XD 45, .45 caliber pistol, bearing serial number US678545 from Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to K.B. which statement was intended and likely to deceive K.B., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 6

On or about, April 26, 2013, in the Eastern District of Washington, the Defendant, RUSSELL MELVIN HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 35, .40 caliber pistol, bearing serial number TWR685, and a Sig-Sauer, Model 1811 Ultra Compact, .45 caliber pistol, bearing serial number 54A013587, from Northwest Pawn & Collector Arms, 818 N. Pines Road, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to K.B. which statement was intended and likely to deceive K.B., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 7

On or about December 5, 2014, in the Eastern District of Washington, the Defendant, RUSSELL MELVIN HUNT in connection with the acquisition of firearms, to wit: a Sig-Sauer Mosquito .22 caliber pistol, bearing serial number F023918, and a Kimber Ultra Carry II .45 caliber pistol, bearing serial number KU25816, from Stan's Merry Mart, Inc.; 733 S. Wenatchee Ave., Wenatchee, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to E.R. which statement was intended and likely to deceive E.R., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 8

On or about November 20, 2012, in the Eastern District of Washington, the Defendant, RUSSELL MELVIN HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 26, 9mm pistol, bearing serial number TMH232, and a Glock Model 19 9mm pistol, bearing serial number THN666, from White Elephant #1, 1730 N. Division, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to D.B. which statement was intended and likely to deceive D.B., as to a fact material to the lawfulness of such sale of said firearms to the defendant under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 9

On or about, November 9, 2013, in the Eastern District of Washington, the Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Smith and Wesson Shield 9mm pistol, bearing serial number HPV 4091, and Sig-Sauer

Equinox 9mm pistol, bearing serial number 52A072604, and a Smith and Wesson Bodyguard .380 caliber pistol, bearing serial number KAN 4446, and a Smith and Wesson Ladysmith .38 caliber revolver, bearing serial number CUJ0563, from White Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to T.T. which statement was intended and likely to deceive T.T., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing said firearms for herself when she knew she was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 10

On or about November 9, 2013, in the Eastern District of Washington, the Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Smith and Wesson Bodyguard 380, .38caliber revolver, bearing serial number CUH9069, and Sig-Sauer P238,.380 caliber pistol, bearing serial number 27A214905, from White Elephant #1, 1730 N. Division, Spokane, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to R.V. which statement was intended and likely to deceive R.V., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing said firearms for herself when she knew she was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 11

On or about July 27, 2013, ^{Ech}~~2012~~, in the Eastern District of Washington, the Defendant, MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Charter Arms, Model Chick Lady, .38 caliber revolver, bearing serial number 13-16837, and a Ruger, Model LCR LG, bearing serial number 542-32770, from White Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the

1 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
2 fictitious written statement to R.J. which statement was intended and likely to deceive
3 R.J., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
4 under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing
5 said firearms for herself when she knew she was purchasing the firearms for resale to
6 another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
COUNT 12

On or about April 22, 2015, in the Eastern District of Washington, the Defendant,
MARY ALICE HUNT, in connection with the acquisition of firearms, to wit: a Ruger
Model LCR, .38 caliber revolver, bearing serial number 543-03357, and a Ruger Model
LCR, .38 caliber revolver, bearing serial number 543-29073, from Stan's Merry Mart,
Inc., 733 S. Wenatchee Ave., Wenatchee, a licensed dealer of firearms within the
meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
fictitious written, statement to G.R., which statement was intended and likely to deceive
G.R., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
under Chapter 44 of Title 18, in that the Defendant represented that she was purchasing
said firearms for herself when she knew she was purchasing the firearms for resale to
another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 13

On or about June 12, 2014, in the Eastern District of Washington, the Defendant,
TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a
Glock Model 42, .380 caliber pistol, bearing serial number AATU232, and a Kimber
Solo 9mm pistol, bearing serial number S1156588, from H.O.T.S., Inc., Hooked On
Toys, located at 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms
within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false
and fictitious written statement to S.S., which statement was intended and likely to
deceive S.S., as to a fact material to the lawfulness of such sale of said firearms to the
Defendant under Chapter 44 of Title 18, in that the Defendant represented that he was

1 purchasing said firearms for himself when he knew he was purchasing the firearms for
2 resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

3 COUNT 14

4 On or about July 27, 2013, in the Eastern District of Washington, the Defendant,
5 TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a
6 Springfield Model XDS .45 caliber pistol, bearing serial number XS 678438, and a
7 Springfield, Model XDS 9 mm pistol, bearing serial number XS-911623, from White
8 Elephant #2, E. 12614 Sprague, Spokane, WA, a licensed dealer of firearms within the
9 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
10 fictitious written statement to T.T. which statement was intended and likely to deceive
11 T.T., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
12 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing
13 said firearms for himself when he knew he was purchasing the firearms for resale to
14 another person; in violation of 18U.S.C. §§ 922(a)(6), 924(a)(2).

15 COUNT 15

16 On or about November 26, 2014, in the Eastern District of Washington, the
17 Defendant, TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to
18 wit: a, Kimber Solo 9mm pistol, bearing serial number S1160664, and a Kimber Solo
19 9mm pistol, bearing serial number S1135246, from H.O.T.S., Inc., Hooked on Toys,
20 1444 N. Wenatchee, Ave., Wenatchee, WA, a licensed dealer of firearms within the
21 meaning of Chapter 44, Title 18, United States Code, knowingly made a false and
22 fictitious written statement to S.S., which statement was intended and likely to deceive
23 S.S., as to a fact material to the lawfulness of such sale of said firearms to the Defendant
24 under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing
25 said firearms for himself when he knew he was purchasing the firearms for resale to
26 another person; in violation of 18U.S.C. §§ 922(a)(6), 924(a)(2).

COUNT 16

On or about June 10, 2014, in the Eastern District of Washington, the Defendant, TERRY RUSSELL HUNT, in connection with the acquisition of firearms, to wit: a Glock Model 42, .380 caliber pistol, bearing serial number ATTS368, and a Smith and Wesson, M&P 9 Shield 9mm pistol, bearing serial number HSB6299, from Stan's Merry Mart, Inc., 733 S. Wenatchee Ave., Wenatchee, WA, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to D.W., which statement was intended and likely to deceive D.W., as to a fact material to the lawfulness of such sale of said firearms to the Defendant under Chapter 44 of Title 18, in that the Defendant represented that he was purchasing said firearms for himself when he knew he was purchasing the firearms for resale to another person; in violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations contained in the Indictment are hereby re-alleged and incorporated herein by this reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. §§ 922(a)(1)(A), 371, as set forth in Count 1 of this Indictment, Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT, shall forfeit to the United States, any firearms and ammunition involved in the commission, including, but not limited to:

Seized on or about November 13, 2015

1. Colt Unknown Revolver, Caliber: .38, SN: 229805;
2. Smith & Wesson 686 Revolver, Caliber: .357, SN: ADW7868;
3. Colt Ace Pistol, Caliber: .22, SN: 400521;
4. Smith & Wesson 19 Revolver, Caliber: .357, SN: 1K53943;
5. Colt SAA Revolver, Caliber: .45, SN: S28967A;
6. Ruger Bearcat Revolver, Caliber: .22 SN: 91-30370;
7. Smith & Wesson 27 Revolver, Caliber: .357 SN: N81284;

8. Smith & Wesson 41 Pistol, Caliber: .22 SN: 12923;
9. Beretta, Pietro S.P.A 86 Pistol, Caliber: .380 SN: G08577Y;
10. Beretta USA Corp 21A Pistol, Caliber: .22 SN: BCS27326U;
11. Rifles Inc., Caliber: 7mm, SN: S6269094;
12. Stevens Unknown Rifle, Caliber: .22LR, SN: K16;
13. Glock, Inc. 32 Pistol, Caliber: .357, SN: FDH648;
14. Ruger 10/22 Rifle, Caliber: .22, SN: 82102649;
15. Benelli Super Black Eagle Shotgun, Caliber: 12 gauge, SN: U121684;
16. Winchester 37 Shotgun, Caliber: .410, SN: None;
17. Bond Arms Inc. Snake Slayer Derringer, Caliber: 45/410, SN: 62777;
18. Winchester 94 Rifle, Caliber: 25-35, SN: 1605994;
19. Winchester 94 Rifle, Caliber: .30, SN: 1396790;
20. Winchester 62A Rifle, Caliber: .22, SN: 353115;
21. Smith & Wesson M&P 15-22 Rifle, Caliber: .22, SN: DZY6082;
22. Ithaca Gun Co. Hammerless Shotgun, Caliber: 12 gauge, SN: 114666;
23. Colt Frontier Scout Revolver, Caliber: .22, SN: 180922F;
24. Remington Arms Company, Inc. 700 Rifle, Caliber: .280, SN: C6393169;
25. Barrett Firearms Mfg. Co. 99 Rifle, Caliber: .50 BMG, SN: 1688;
26. Uberti, Aldo 1873 Dakota Revolver, Caliber: .45, SN: 76158;
27. Browning Auto Rifle, Caliber: .22, SN: 12448PY146;
28. F.N. (FN Herstal) FNAR Rifle, Caliber: .762, SN: 319MN03564;
29. Sig-Sauer P220 Pistol, Caliber: .22, SN: G424321;
30. Ruger Creedmoor Rifle, Caliber: 6.5 mm, SN: 694-53677;
31. F.N. (FN Herstal) Mauser Rifle, Caliber: .270, SN: X0744
32. Ruger 10/22 Rifle, Caliber: .22, SN: 25080832;
33. Sako L61R Finnbear Rifle, Caliber: .30-06, SN: 518682;
34. Smith & Wesson Unknown Rifle, Caliber: .270, SN: 327054;
35. USA F MFG 22 Revolver, Caliber: .22LR, SN: 22835;
36. Sig Sauer (Sig-Arms) Sig M400 Rifle, Caliber: .556, SN: 20C047273;
37. Browning BL Rifle, Caliber: .22, SN: 71B32828;
38. Winchester 70 Rifle, Caliber: .257, SN: 43641;
39. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B091082;
40. Stag Arms Stag-15 Rifle, Caliber: .556, SN: 256668;
41. Miroku Firearm Co. Unknown Rifle, Caliber: Unknown; SN: 02178PN136;
42. Sako L61R Finnbear Rifle, Caliber: .375, SN: 509768;
43. Rock River Arms, Inc. AR 15 Rifle, Caliber: .556, SN: LH104728;

44. Rifle Works, Caliber: 7mm, SN: C6598828;
45. Winchester 70 Rifle, Caliber: .30-06, SN: 287;
46. F.N. (FN Herstal) Mauser Rifle, Caliber 7mm, SN: X0307;
47. Lewis Machine and Tool Co. Defender 2000 Rifle, Caliber: .556, SN: 65056;
48. Juggernaut TactiCaliber, Inc. JT-10 Rifle, Caliber: .762, SN: B23970D;
49. Savage 11 Rifle, Caliber 6.5mm, SN: J825739;
50. Henry Repeating Rifle Company Golden Boy Rifle, Caliber: .22, SN: GB432946;
51. Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: .223, SN: BC-05242;
52. Blaser (Blaser Jagdwaffen GMBH) R93 Rifle, Caliber: 7mm, SN: BC-04666;
53. Winchester 94 Rifle, Caliber: .30-30, SN: 6331790;
54. Great Guns 7mm Rifle, SN: S6237365;
55. Winchester M70 Rifle, SN: 271538;

Seized on or about December 2, 2015

56. Mossberg 464 Rifle, Caliber: .30-30, SN: LA061324;
57. Ruger Precision Rifle, Caliber: .308, SN: 1800-05104
58. Mossberg 151MB Rifle, Caliber: .22, SN: None;
59. Savage Arms, Inc., CD 42 Combination Gun, Caliber: .22/410, SN: H856503;
60. Remington Arms Company, Inc., 700 Rifle, Caliber: 7mm, SN: S6387446;
61. Unknown Manufacturer AR15 Rifle, Caliber: .223, SN: D14382B;
62. Winchester 70 Rifle, Caliber: .30-06, SN: 374956;
63. Kimber Solo CDP Pistol, Caliber: 9mm, SN: S1140651;
64. Izhmash (IMEZ) Saiga-12 Shotgun, Caliber: 12 gauge, SN: H09412792;
65. Unknown Manufacturer AR15 Rifle, Caliber: .556, SN: D44812B;
66. Stonefire Arms, LLC, SFA-15 Rifle, Caliber: .556, SN: A100079;
67. Rock River Arms, Inc., AR 15 Rifle, Caliber: .556, SN: CM74218;
68. Gaucha IGA Shotgun, Caliber: 20 gauge, SN: 862039;
69. Stag Arms Stag-15 Rifle, Caliber: 556 SN: 256185;
70. CZ USA 452 Scout Rifle Caliber: .22LR, SN: A096252;
71. Palmetto State Armory PA-15 Rifle, Caliber: .556, SN: LW130272;
72. Kimber Micro Carry Pistol, Caliber: .380, SN: T0014930;
73. Smith & Wesson PC1911 Pistol, Caliber: .45, SN: UCY0417;

74. Smith & Wesson 648 Revolver, Caliber: .22, SN: BHJ9249;
75. Smith & Wesson 642 Revolver, Caliber: .38, SN: CRA7616;
76. Smith & Wesson Bodyguard Revolver, Caliber: .38, SN: CXX5883;
77. Glock Inc., 17 Pistol, Caliber: 9mm, SN: TKC181;
78. Smith & Wesson 637-2 Pistol, Caliber: .38, SN: CRD6671;
79. Glock Inc. 43 Pistol, Caliber: 9mm, SN: ZXK553;
80. Sig-Sauer 1911 C3 Pistol, Caliber: .45, SN: GS79082;
81. Ruger LCR Revolver, Caliber: .38, SN: 543-03357;
82. Glock Inc. 21 Pistol, Caliber: .45, SN: HMM766;
83. Glock Inc. 42 Pistol, Caliber: .380, SN: ABHT193;
84. Ruger LCR Revolver, Caliber: .38, SN: 543-29073;
85. Glock Inc. 45 Pistol, Caliber: 9mm, SN: BABS921;
86. Glock Inc. 19 Pistol, Caliber: 9mm, SN: WSW199;
87. Glock Inc. 19 Pistol, Caliber: 9mm, SN: RRU153;
88. Ruger LCR Revolver, Caliber: 9mm, SN: 549-61096;
89. Ruger LCR Revolver, Caliber: .38, SN: 542-20381;
90. Israel Weapon IND-IWI (Israel Military IND-IMI) Desert Eagle, Caliber: .50, SN: 95203762;
91. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS77;
92. Beretta USA Corp BU9 Nano Pistol, SN: NU094018;
93. Sig-Sauer 1911 Pistol, Caliber: .45, SN: 54B108738;
94. Smith & Wesson M&P 9.Shield Caliber: 9mm, Pistol, SN: HWR2225;
95. Sig-Sauer P938 Pistol, Caliber: 9mm, SN: 52A024553;
96. Glock Inc. 32 Pistol, Caliber: .357, SN: ETL139US;
97. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS73;
98. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS78;
99. Keltec, CNC Industries, Inc. PMR-30 Pistol, Caliber: .22, SN: WXS75;
100. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: 9mm, SN: 52B142772;
101. Sig Sauer (Sig-Arms) P938 Pistol, Caliber: .22, SN: 52B051643;
102. Smith & Wesson M&P Caliber: 9mm, Shield Pistol, SN: HKC7899;
103. Taurus International The Judge Revolver, Caliber: .45/410, SN: IU158697;
104. Smith & Wesson 10-6 Revolver, Caliber: .38, SN: D996600;
105. Smith & Wesson 10-8 Revolver, Caliber: .38, SN: 9D89438;
106. Taurus International The Judge Revolver, Caliber: .45/410, SN: CP771584;

107. Smith & Wesson 10-5 Revolver, Caliber: .38, SN: C935163;
108. Colt Bisley Revolver, Caliber: .32, SN: 312059;
109. Smith & Wesson 63 Revolver, Caliber: .22, SN: 7145;
110. Glock Inc. 27 Pistol, Caliber: .40, SN: NDD346; and,
111. Smith & Wesson 66 Revolver, Caliber: .357, SN: CFT9446

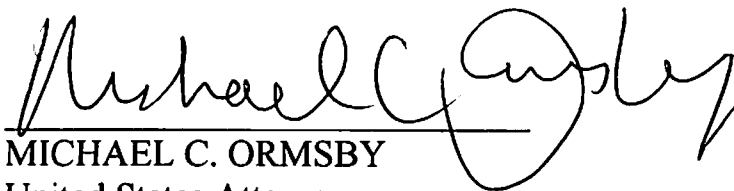
If any of the property described above, as a result of any act or omission of any of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

Dated this 20th day of December, 2016.

A TRUE BILL


MICHAEL C. ORMSBY

United States Attorney


Earl A. Hicks

Assistant United States Attorney